

Mars Marketing Code Commitments

Mars, Incorporated owns many of the top snackfood and food brands globally and has a long history of marketing its products responsibly. As we do from time to time, consistent with our corporate values, legal and self-regulatory principles, and consumer expectations, we have revised our Snackfood/Food Marketing Commitments, based on the principles set out below.

We are committed to the responsible and creative use of advertising in all its forms. Our global marketing commitments apply to the marketing communications for all food, chocolate, confections and gum products produced and licensed by Mars, Incorporated and Wrigley on a worldwide basis including media advertising (e.g. broadcast, print and digital, including websites), advertorials, sponsorship, and sweepstakes, contests and similar promotions.

Advertising for our products will not be depicted or placed in programmes / media involving any type of discrimination, stereotyping, inappropriate, unethical or antisocial behaviour or situations antithetical to the Five Principles of Mars.

Our marketing commitments are applicable in addition to all statutory or self-regulatory requirements applicable in every market. Mars actively participates in the external monitoring of its voluntary commitments to assess compliance levels with national, regional or global industry pledge commitments.

As a result of the acquisition of Wrigley by Mars, Incorporated the Code will also be applied to Wrigley products and implementation for all products worldwide by the end of 2013.

General Principles

- We believe in healthy eating and produce ourselves on the high quality of our products. Based on sound scientific knowledge, we know that they can form part of a healthy and enjoyable diet for consumers of all ages.
- Our communications will not undermine the pursuit of a healthy, balanced diet and active lifestyle.
- Our communications will not encourage or condone excessive consumption of any food or drink.
- Our communications will not promote compulsive snacking.
- We will not associate our products with people who are excessively underweight or overweight.
- We will not use a celebrity in a way that might mislead consumers about the benefits of our brands.
- We endorse initiatives to encourage active lifestyles including the sponsorship of sports events.
- We will direct our marketing communications in all media to adults who make household purchasing decisions (gatekeepers) and young people 12 and over, both in terms of ad content and media purchasing.
- Our marketing communications on food, chocolate confections and gum products of interest to children under 12 will aim to allow gatekeepers to make informed choices about whether our products are appropriate for the children in their care.

Principles regarding marketing to children

Advertising

- We will not advertise our food and snackfood products in media primarily directed to children under 12, both in terms of ad content and media purchasing. For purposes of this commitment,

we will not purchase advertising time or space where the composition of the under-12 audience, at the time of the media buy, is expected to exceed 25%.

- We will not advertise, sponsor or undertake product placement in films or media programming where the intended audience is primarily children under 12.

Portrayal of children

- We will not show children under 12 consuming our chocolate and confections products in our marketing communications. Given the oral healthcare benefits of chewing we will continue showing children chewing gum.
- We will not portray physically inactive children, e.g. just watching TV or playing inactive computer games.
- Given the nutritional benefits of certain foods such as e.g. whole grain foods, we will continue showing children enjoying such foods.

Seasonal themes

- We will continue to link our products to seasonal themes and events such as Easter, Christmas, Valentine's, Mother's Day, Chinese New Year, Back to School or Halloween etc but our marketing communications around themes and events which are relevant to children will be primarily directed to gatekeepers.

Celebrities and licensed characters

- We will not use a celebrity or third-party licensed character intended to appeal primarily to children under 12 to promote our chocolate, confections and gum products.
- We will continue to use our traditional brand characters (e.g. M&M's and Dolmio) consistent with our over 12-year-old audience.

Schools

- We will not place vending machines offering our core snackfood products in primary schools but we may offer products from our food portfolio provided they have superior nutritional composition.
- We will cease to offer branded educational materials for use in schools by children under 12.
- We will not sponsor sports events in primary schools.
- We will continue to donate funds or products to schools and community institutions where the school/institution has specifically requested this support in writing.
- We will continue to engage in activities aimed at children regarding nutrition, health or physical exercise, in co-operation with government and/or other recognised authorities.

Digital media and promotions

- Our use of digital media for marketing communications will be primarily directed to adults and teens. We will not advertise or promote our websites in venues primarily directed to children under 12.
- We will use neutral age-screening techniques to ensure that we have taken all reasonable steps to restrict children under the age of 13 from submitting personal information to the Company, as well as restrict their ability to view advertising, download branded wallpaper, screensavers or

other leave behind material from websites of potential interest to younger audiences or to upload pictures or information in social networking arenas.

Privacy

We respect consumer privacy and use special care in safeguarding personal information entrusted to us by consumers. We will not share personal details with outside third parties without consent.

Note: Our marketing commitments may require revisions from time to time to ensure that they are consistent with our corporate values and principles, as well as changes in the market place and changes within our company.